

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: Jeffrey Chamberlain
Debtor

Nationstar Mortgage LLC,
Movant,

v.

Jeffrey Chamberlain,
Respondent/Debtor,
and
Ronda J. Winnecour, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
16-10177/TPA

Hearing April 19, 2016 at 1:00 pm

Docket #: _____

Related to Doc # 9

**OBJECTION OF NATIONSTAR MORTGAGE LLC TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Nationstar Mortgage LLC, by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about March 4, 2016, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.
3. Movant is in the process of filing a Proof of Claim and wishes for the hearing to be continued until after the POC Bar date.
4. Movant holds an allowed claim, secured only by Debtor's principal residence located at 154 Carrier Road, Transfer, PA 16154.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Nationstar Mortgage LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: April 15, 2016

BY: /s/ Kristen D. Little
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S&D File #:15-049919

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ORDER

AND NOW, this _____ day of _____, 2016, upon consideration of the Objection of Nationstar Mortgage LLC to the confirmation of Debtor's Chapter 13 Plan of Reorganization, it is hereby ORDERED that the Objection is sustained, and confirmation of Debtor's Plan is denied.

BY THE COURT:

HONORABLE THOMAS P. AGRESTI
UNITED STATES BANKRUPTCY JUDGE